

May 20, 2025

VIA ECF & EMAIL

The Honorable John P. Cronan United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 The request is granted. Mr. Anderson's bail conditions are modified to permit him to travel to Elon, North Carolina from May 21, 2025 to May 24, 2025, to attend his daughter's graduation, provided that Mr. Anderson provides Pretrial Services with a detailed itinerary prior to the trip.

SO ORDERED May 20, 2025 New York, New York

JOHN P. CRONAN United States District Judge

Re: United States v. Michael Anderson, 23-CR-595 (JPC)

Dear Judge Cronan:

I write on behalf of Michael Anderson, my client in the above-captioned case, who is scheduled to be sentenced before this Court on July 7, 2025, at 10:00 a.m. Mr. Anderson's bail conditions restrict travel to the Southern and Eastern Districts of New York and the Western District of Washington. ECF 13.

I respectfully request that the Court permit a last-minute modification of Mr. Anderson's bail conditions to permit travel from his home in Washington to Elon, North Carolina, from Wednesday, May 21, 2025, to Saturday, May 24, 2025. The reason for this request is that Mr. Anderson's daughter's graduation is on Friday, May 23rd. While Mr. Anderson had previously decided not to attend over concerns about his father's health, Mr. Anderson's son recently gifted him with airline miles to attend the ceremony, provided he was able to make the trip. Mr. Anderson had to make a last-minute decision to accept these miles, because his father recently underwent a medical procedure, and Mr. Anderson was holding off until he was considered "stable" by his providers. Thankfully, Mr. Anderson's father is now stable, and Mr. Anderson is hoping to make the trip to North Carolina. If granted permission by this Court, Mr. Anderson would leave on a redeye flight on Wednesday (5/21), returning to Washington Saturday (5/24).

Accordingly, I respectfully request that the Court permit this temporary modification to Mr. Anderson's bail conditions from May 21, 2025, to May 24, 2025. The government, through AUSA Rushmi Bhaskaran, has no objection to this request. At the time of filing this letter, we were informed that Officer Mike Munsterman, U.S. Pretrial Services Officer out of the Western District of Washington, was in training until later in the day, so we do not yet have his position. Upon any approval of this request, Mr. Anderson's travel details will be promptly provided to the government and U.S. Pretrial Services.

Thank you for the Court's consideration to this time-sensitive issue.

Respectfully submitted,

/s/

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